UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

STIPULATION AND [PROPOSED]
ORDER EXTENDING THE BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION

This Document Relates To: All Actions

This Stipulation is entered into between Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc., Named Plaintiff Sergey Regukh, and Movant E-Global Trade and Finance Group, Inc. (collectively, "Plaintiffs") and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (collectively, "Defendants").

WHEREAS, Plaintiffs filed their Motion for Class Certification and Appointment of Class Representative and Class Counsel (the "Class Certification Motion") on January 6, 2020;

WHEREAS, Defendants' deadline to file their opposition to the Class Certification Motion is April 3, 2020, and Plaintiffs' deadline to file their reply in support of the Class Certification Motion is May 18, 2020;

WHEREAS, given the challenges resulting from the current COVID-19 pandemic, the parties require additional time to conduct discovery, including the depositions of Lead Plaintiffs;

WHEREAS, on February 28, 2020, the parties requested an extension of the deadlines related to the Class Certification Motion, which was granted by the Court on March 2, 2020;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that Defendants' deadline to oppose the Class Certification Motion is extended to May 8, 2020, and Plaintiffs'

deadline to file their reply in support of their Class Certification Motion is extended to June 22, 2020.

THE ROSEN LAW FIRM, P.A. KING & SPALDING LLP /s/ Joshua Baker /s/ Paul R. Bessette Phillip Kim Paul R. Bessette Laurence M. Rosen Israel Dahan Joshua Baker 1185 Avenue of the Americas 275 Madison Avenue, 40th Floor New York, New York 10036-2601 New York, New York 10016 Tel: (212) 556.2100 Telephone: (212) 686-1060 Fax: (212) 556.2200 Fax: (212) 202-3827 Email: pkim@rosenlegal.com Rebecca Matsumura, pro hac vice Email: lrosen@rosenlegal.com 500 W. 2nd Street Suite 1800 Email: jbaker@rosenlegal.com Austin, Texas 78701 Tel: (512) 457.2000 Fax: (512) 457.2100 Lead Counsel for Lead Plaintiffs WOLF HALDENSTEIN ADLER Attorneys for Defendants FREEMAN & HERZ LLP Matthew M. Guiney, Esq. (MG 5858) 270 Madison Avenue New York, NY 10016 Tel: (212) 545-4600 Email: guiney@whafh.com Additional Counsel SO ORDERED, on this ____ day of ______, 2020

Barbara Moses

United States Magistrate Judge